

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMBASSADOR PUBLICATIONS, LLC,

Plaintiff,

-against-

REACHLOCAL, INC AND STEPHAN CESARINI,

Defendants.

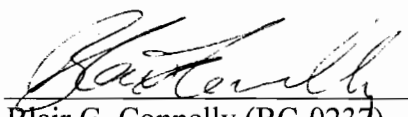
07 Civ. 5687 (LTS)

**NOTICE OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

PLEASE TAKE NOTICE that upon the annexed Declaration of Blair G. Connelly, dated June 27, 2007, the accompanying Declaration of Michele L. Lorbieski, dated June 25, 2007 and the exhibit annexed thereto, the undersigned moves this Court for an Order, pursuant to Rule 1.3(c) of the Local Rules for the United States District Court for the Southern and Eastern Districts of New York, admitting Michele L. Lorbieski to the bar of this Court *pro hac vice* in order to argue and try the above-captioned case as counsel for Defendants ReachLocal, Inc. and Stephan Cesarini.

Dated: New York, New York
June 27, 2007

LATHAM & WATKINS LLP

By: 
Blair G. Connelly (BC-0237)

885 Third Avenue, Suite 1000
New York, New York 10022
(212) 906-1200

*Counsel for Defendants
ReachLocal, Inc. and Stephan Cesarini*

To: All Counsel of Record

619-410 #25 6-27-07 RQ

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMBASSADOR PUBLICATIONS, LLC,

Plaintiff,

-against-

REACHLOCAL, INC AND STEPHAN CESARINI,

Defendants.

07 Civ. 5687 (LTS)

**DECLARATION OF
BLAIR G. CONNELLY**

BLAIR G. CONNELLY, pursuant to 28 U.S.C. § 1746, hereby declares under the penalty of perjury as follows:

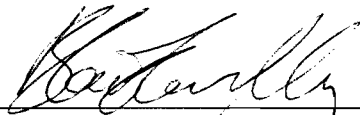
1. I am a member of the law firm of Latham & Watkins LLP, counsel for Defendants ReachLocal, Inc. and Stephan Cesarini in this action. I submit this Declaration in support of the motion, pursuant to Local Rule 1.3(c) of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York, for an Order granting Michele L. Lorbieski admission *pro hac vice* to the bar of the United States District Court for the Southern District of New York in order to argue and try the above-captioned case.

2. I am a member in good standing of the bar of this Court.

3. I have reviewed the Declaration of Michele L. Lorbieski in support of the motion for admission *pro hac vice* submitted herewith, and I believe that the declaration is true and correct. Michele L. Lorbieski is fully familiar with the facts of this case.

4. Upon the foregoing facts, I respectfully request that the Court grant the motion for the admission *pro hac vice* of Michele L. Lorbieski to the bar of the United States District Court for the Southern District of New York.

I declare under penalty of perjury that the foregoing is true and correct. Executed
on this 27 day of June, 2007, in New York, New York.



Blair G. Connelly (BC-0237)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMBASSADOR PUBLICATIONS, LLC,

Plaintiff,

-against-

REACHLOCAL, INC AND STEPHAN CESARINI,

Defendants.

07 Civ. 5687 (LTS)

**DECLARATION OF
MICHELE L. LORBIESKI**

MICHELE L. LORBIESKI, pursuant to 28 U.S.C. § 1746, hereby declares under the penalty of perjury as follows:


1. I am a member of the law firm of Latham & Watkins, LLP, located at 633 West Fifth Street, Suite 4000, Los Angeles, California, 90071.

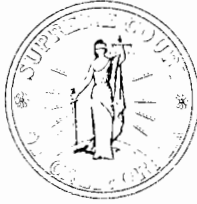
2. I submit this Declaration in support of the motion to admit counsel *pro hac vice* in the above-captioned matter. As demonstrated by the Certificate of Good Standing annexed hereto, I am a member in good standing of the Bar of the State of California.

3. There are no pending disciplinary proceedings against me in any State or Federal Court.

4. Wherefore, I respectfully request that I be permitted to appear as counsel and advocate *pro hac vice* in the above-captioned case.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 25 day of June, 2007, in Los Angeles, California.


Michele L. Lorbieski



Supreme Court of California

FREDERICK K. OHLRICH

Clerk of the Court

CERTIFICATE OF THE CLERK OF THE SUPREME COURT OF THE STATE OF CALIFORNIA

I, FREDERICK K. OHLRICH, Clerk of the Supreme Court of the State of California, do hereby certify that Michele Linn Lorbieski was on the 12th day of December 2006 duly admitted to practice as an attorney and counselor at law in all the courts of this state; and that her name now appears on the Roll of Attorneys as a member of the bar of this state in good standing.

*Witness my hand and the seal of the court,
this 21st day of June, 2007.*

FREDERICK K. OHLRICH

Clerk of the Supreme Court

By: 

Deputy Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMBASSADOR PUBLICATIONS, LLC,

Plaintiff,

-against-

REACHLOCAL, INC AND STEPHAN
CESARINI,

Defendants.

07 Civ. 5687 (LTS)

**ORDER GRANTING MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

This matter having been brought before the Court by motion to admit Michele L. Lorbieski *pro hac vice* to appear and participate as counsel for Defendants ReachLocal, Inc. and Stephan Cesarini in the above-captioned action, and the declaration of such attorney having been submitted in support thereof, and it appearing that such attorney is a member in good standing of the bar of the state in which he is admitted to practice law, and there are no disciplinary proceedings against him as a member of the bar in any jurisdiction; it is

ORDERED that, pursuant to Local Civil Rule 1.3(c) of this Court, Michele L. Lorbieski of the State of California bar is admitted *pro hac vice* to practice before this Court as counsel for ReachLocal, Inc. and Stephan Cesarini in these proceedings.

Dated: _____, 2007

Honorable Laura T. Swain
United States District Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMBASSADOR PUBLICATIONS, LLC,

Plaintiff,

- against -

REACHLOCAL, INC., STEPHAN CESARINI,
PAUL DeBIASE, LAWRENCE STONE,
ADVANCED ROI and ANDREW KNIGHT,

Defendants.

07 Civ. 5687 (LTS)

CERTIFICATE OF SERVICE

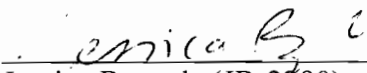
I, Jessica Bengels, hereby certify that on June 27, 2007, true and correct copies of the attached: (1) Notice of Motion to Admit Counsel Pro Hac Vice, dated 6/27/07; (2) Declaration of Blair G. Connelly, dated 6/27/07; (3) Declaration of Michele L. Lorbieski, dated 6/25/07; and (4) [Proposed] Order Granting Motion to Admit Counsel Pro Hac Vice, were caused to be served in accordance with the Federal Rules of Civil Procedure via First Class U.S. Mail upon:

Peter T. Shapiro, Esq.
Lewis Brisbois Bisgaard & Smith LLP
199 Water Street
New York, New York 10038
Counsel for Plaintiff

Dated: June 27, 2007
New York, New York

LATHAM & WATKINS LLP,

By:



Jessica Bengels (JB-2290)

885 Third Avenue
New York, New York 10022
(212) 906-1200

Counsel for Defendants
ReachLocal, Inc. and Stephan Cesarini

Of Counsel:
Daniel Scott Schechter
Jason J. Kim
Amjad M. Khan
Michele L. Lorbieski
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